

JOINT STIPULATION

Plaintiffs Marc Ginsberg and the Coalition for a Safer Web (collectively, “Plaintiffs”), and Defendant Google LLC, erroneously sued as Google Inc. (“Google”), jointly submit this Stipulation to extend (1) Plaintiffs’ deadline to oppose Google’s motion to dismiss the First Amended Complaint (“FAC”); and (2) Google’s deadline to file a reply in support of its motion to dismiss:

WHEREAS, Plaintiffs filed their complaint on January 25, 2021;

WHEREAS, Google filed a motion to dismiss the complaint (ECF 14);

WHEREAS, pursuant to the stipulation of the parties (ECF 15) granted by this Court (ECF 16), Plaintiffs’ deadline to submit an opposition to Google’s motion to dismiss was June 7, 2021;

WHEREAS, in lieu of filing an opposition to Google’s motion to dismiss, Plaintiffs filed their FAC on June 8, 2021 (ECF 17) and a corrected FAC on June 11, 2021 (ECF 19);

WHEREAS, pursuant to the stipulation of the parties (ECF 18) granted by this Court (ECF 21), Google’s deadline to respond to the FAC was July 13, 2021;

WHEREAS, Google filed a motion to dismiss the FAC (ECF 23) on July 13, 2021;

WHEREAS, pursuant to Local Rule 7-3, Plaintiffs’ deadline to oppose the motion to dismiss is July 27, 2021 and Google’s deadline to file a reply is August 3, 2021;

WHEREAS, Plaintiffs’ counsel and Google’s counsel have agreed to an extension of Plaintiffs’ deadline to oppose the motion to dismiss to September 13, 2021 and an extension of Google’s deadline to file a reply to November 15, 2021;

WHEREAS, the parties submit that this extension is appropriate in light of the hearing date set for the motion to dismiss the FAC of December 16, 2021; the extended briefing timeline will not cause undue delay and will allow both parties to account for relevant authorities issued between the filing of Google’s motion to dismiss and the December 16 hearing;

THE PARTIES HEREBY STIPULATE AND AGREE, subject to the Court’s approval, to the following:

1. Plaintiffs’ deadline to oppose the motion to dismiss shall be extended from July 27, 2021 to September 13, 2021;

2. Google's deadline to file a reply shall be extended from August 3, 2021 to November 15, 2021.

Respectfully submitted,

Dated: July 13, 2021

WILSON SONSINI GOODRICH & ROSATI
Professional Corporation

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GOOGLE LLC

Dated: July 13, 2021

THE LAW OFFICE OF KEITH ALTMAN

By: /s/ Keith Altman
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Attorneys for Plaintiffs
AMBASSADOR MARC GINSBERG and
COALITION FOR A SAFER WEB

SIGNATURE ATTESTATION

I, Meng Jia Yang, hereby attest that all other signatories listed, and on whose behalf the filing is submitted, concur in the filing's content and have authorized the filing of this e-filed document.

By: /s/ Meng Jia Yang
Meng Jia Yang

PURSUANT TO STIPULATION, IT IS SO ORDERED

Dated:

Honorable Beth Labson Freeman
United States District Court Judge